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November 8, 1985

Mr. Walter J. Ruzzo Environmental Coordinator San Juan Coal Company P. O. Box 561 Waterflow, New Mexico 87421

Dear Mr. Ruzzo:

Re: 1985 Reclamation Plan, Utah International Inc., Cedar City Operation, ACT/021/001, Iron County, Utah

The Division has reviewed the reclamation plans submitted November 4, 1985, for various problem areas of the Cedar City Operation.

While the Division does not have a problem with implementation of the plan as stated, please consider the following comments as you implement the plan:

## LOW GRADE STOCKPILES NO. 14, 15 & 18

- 1. Sufficient rabbitbrush exists in these areas that this species would not have to be seeded.
- 2. It is recommended that ripping only be done to alleviate compaction since discing would destroy most vegetation that is already established.

## WALKER IRON PLACER SITE

1. The Division is concerned that any ripping or discing that is not on the contour would probably cause more damage than good due to the extremely erosive nature of the hillside. Therefore, it is suggested that seed be broadcast on the hillside followed by running a crawler tractor up/down the hill, thus leaving cleat marks on the contour.

Should vegetation establishment not meet success criteria with this treatment, the following should be done before any additional treatment is implemented. Page 2 Mr. Walter J. Ruzzo ACT/021/001 November 7, 1985

- The success standard should be re-evaluated and adjusted based on vegetation cover of similar slopes and soil types.
- 2. The practicality of any other treatments in aiding vegetation growth should be evaluated as per Rule M=10(12)(3).

Also, would you please send us one copy of the maps that show where the problem areas are for our files.

Your cooperation in addressing these problems areas is greatly appreciated. Should you have additional concerns, please don't hesitate to call.

Sincerely,

Lyħn Kunzler

Reclamation Biologist

jvb

cc: York Jones

Sue Linner

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